

Air Quality Operating Permit and Registration Requirements for Petroleum Solvent Dry Cleaners

BACKGROUND

Why Am I Regulated?

The Environmental Protection Agency (EPA) has adopted performance standards for many types of industrial facilities called New Source Performance Standards (NSPS) which can be found in 40 CFR Part 60. Listed types of industrial facilities, which are built, modified or reconstructed after the dates listed in the NSPS, must comply unless exempted by the regulation. Each new source performance standard contains requirements applicable to the type of industry being regulated. There are also general requirements applicable to all industries subject to NSPS, such as monitoring and record keeping requirements. Each NSPS defines what facilities are subject to it and contains emission limits for specified pollutants, compliance requirements, specific monitoring requirements, and applicable test methods and procedures.

If you own and operate a petroleum dry cleaning operation, you are subject to 40 CFR Part 60, Subpart JJJ, Standards of Performance for Petroleum Dry Cleaners, if you meet the following criteria:

- The dryer capacity is equal to or greater than 38 kilograms (84 pounds); and
- The facility commenced construction or was modified **after** December 14, 1982.

AIR QUALITY OPERATING PERMITS

Current Idaho Law requires the Idaho Department of Environmental Quality to issue Tier I Operating Permits to all sources regulated under Title V of the Clean Air Act. This includes sources regulated by NSPS. As a result, a number of smaller sources will be impacted that may not have previously been subject to permitting requirements prior to this time.

How Does This Affect Me?

All owners or operators of dry cleaning facilities that use petroleum solvent that are subject to NSPS are also subject to the Clean Air Act Title V operating permit requirements.

Idaho's Department of Environmental Quality (DEQ) will be issuing these operating permits to the dry cleaners. However, DEQ is not issuing these operating permits until June 1, 2006 if the source registers by May 1, 2001. Under this deferral, these sources must continue to comply with all of the

operational requirements, emission limitations, and the reporting and record keeping requirements that are part of the federal and state regulations.

REGISTRATION REQUIREMENT

DEQ believes that air quality in the State can be effectively managed by registering facilities and obtaining air emissions information without imposing operating permit and fee requirements on these sources at this time.

Therefore, on June 23, 2000 the DEQ Board adopted a rule that allows facilities to do one of the following:

1. You can register now with DEQ. If you choose to register now, you will not need to submit your application for your air quality operating permit until June 1, 2005; or
2. You choose **not** to register with DEQ. If you choose **not** to register with DEQ, you must submit your air quality operating permit application immediately, as it was required to be submitted to DEQ on June 1, 2000.

If you choose to register with DEQ, you must submit your registration form to DEQ no later than May 1, 2001.